

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
RAQUEL LAZO
3 Assistant Federal Public Defender
Nevada State Bar No. 8540
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Raquel_Lazo@fd.org

7 Attorney for Cameron Lee Thomas

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 THOMAS ET AL,
15 Defendant.

Case No. 2:18-mj-080-NJK

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(Second Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United
18 States Attorney, and Chad William McHenry, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo,
20 Assistant Federal Public Defender, counsel for Cameron Lee Thomas, and Chris T. Rasmussen,
21 counsel for Schyler Levi Thomas, that the Preliminary Hearing currently scheduled on April
22 24, 2018 at 4:00 p.m., be vacated and continued to a date and time convenient to the Court, but
23 no sooner than sixty (60) days.

24 This Stipulation is entered into for the following reasons:
25
26

1 1. The government expects to produce discovery to defendants by the end of the
2 week. Additional time is needed to obtain and review the discovery. Thereafter, defense
3 counsel will meet and confer with their respective clients regarding the discovery.

4 2. The defendants are not incarcerated and do not object to a continuance.

5 3. The additional time requested by this Stipulation is excludable in computing
6 time within which an information or an indictment must be filed, or in computing time within
7 which trial in the above-captioned matter must commence under the Speedy Trial Act, 18
8 U.S.C. § 3161(h)(7)(B)(i) and (iv).

9 4. Additionally, denial of this request for continuance could result in a miscarriage
10 of justice.

11 This is the second request for continuance filed herein.

12 DATED this 4th day of April, 2018.

13
14 RENE L. VALLADARES
15 Federal Public Defender

 DAYLE ELIESON
 Acting United States Attorney

16 /s/ Raquel Lazo
17 By _____
18 RAQUEL LAZO
19 Assistant Federal Public Defender

 /s/ Chad William McHenry
 By _____
 CHAD WILLIAM MCHENRY
 Assistant United States Attorney

19 /s/ Chris T. Rasmussen
20 By _____
21 CHRIS T. RASMUSSEN
22 Assistant Federal Public Defender

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 THOMAS ET AL,

7 Defendant.

Case No. 2:18-mj-080-NJK

ORDER

9
10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on
12 April 24, 2018 at the hour of 4:00 p.m., be vacated and continued to June 25, 2018, at
13 4:00 p.m., in Courtroom 3B.

14 DATED this 5th day of April, 2018.

15
16 
17 UNITED STATES MAGISTRATE JUDGE
18
19
20
21
22
23
24
25
26